



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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February 7, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On February 3, 2012, Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications, met with Sharon Gillett, Chief of the Wireline Competition Bureau.

The participants discussed the Commission's recent Order in the above-referenced dockets,¹ particularly as it applies to toll traffic originating on the PSTN and terminating on VoIP. Ms. Abernathy voiced her opposition to AT&T's position on this matter that it had recently presented to the Commission staff.² Ms. Abernathy's arguments that traditional intrastate access rates apply to this originating traffic were consistent with those made on this subject in Frontier and Windstreams' pending Petition for Reconsideration and/or Clarification filed in this docket.³

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

¹ *In re: Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-up; Universal Service Reform—Mobility Fund*, WC Dkt Nos. 10-90, 07-135, 05-337, 03-109; GN Dkt No. 09-51; CC Dkt. Nos. 01-92; 96-45; WT Dkt. No. 10-208, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (Rel. Nov. 18, 2011) ("*USF/ICC Order*").

² See Letter from Christi Shewman, AT&T, to Marlene H. Dortch, Fed. Comm'n's Comm'n, CC Dkt. No. 01-92 *et al.* (filed Feb. 2, 2012).

³ Petition for Reconsideration and/or Clarification of Frontier Communications Corp. and Windstream Communications, Inc., CC Docket No. 01-92, *et al.*, at 21-29 (filed Dec. 29, 2011).

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Sharon Gillett